

HARRIS BEACH PLC
ATTORNEYS AT LAW

May 4, 2021

VIA ECF

Honorable Arlene R. Lindsay
United States District Court
Eastern District of New York
814 Federal Plaza
Central Islip, New York 11722

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RE: Galloway v. Nassau County, et al.
Docket No. 19-cv-5026 (AMD)(ARL)

Dear Judge Lindsay,

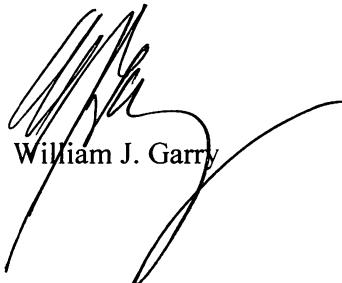
I am compelled to respond to Plaintiff's counsel letter in opposition to our request for a sixty (60) day extension of time in order to allow our office time to review the voluminous files and to prepare any necessary discovery responses.

On April 29, 2021 at approximately 2:58p.m., I called Plaintiff's counsel to introduce myself and advised him that I will be representing the Village Defendants. I thought we had a pleasant conversation. I told Plaintiff's counsel that I needed time to review the files and that I believed that a discovery deadline of the Exchange of Experts by the Defendants was coming up and that I would need more time to reply. I told Plaintiff's counsel that I would be making an application to the Court.

I do not believe that Plaintiff will be underlying prejudice by the granting of the extension of time given the fact that the Plaintiff on January 11, 2021 made a motion to file a Fourth Amended Complaint and on March 8, 2021 filed a motion seeking to compel the County Defendants to exchange additional documents which was denied by the Court on March 30, 2021.

As stated, our request for an extension of time is necessary to review the voluminous documents exchanged to date, the motions made and orders issued and deposition transcripts. Thank you.

Respectfully,



William J. Garry

WJG:ap

VIA ECF
cc: All Counsel